



litigation for Plaintiffs absent settlement. Moreover, the reaction of the class has been positive, with no objections or requests for exclusion received. Finally, the *pro rata* plan of allocation, which was described to settlement class members in the class notice and received no objections, is reasonable and consistent with those approved in other cases.

Accordingly, Plaintiffs respectfully request that the Court grant the motion.

Respectfully submitted, May 31, 2016

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**CERTIFICATE OF SERVICE**

I hereby certify that I caused to be filed the foregoing motion, the memorandum in support thereof, and a proposed order with the Clerk of Court using the CM/ECF system, which served copies of the same on counsel for all parties.

Dated May 31, 2016.

/s/ Gary I. Smith, Jr.

Gary I. Smith, Jr.

